



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

AHT/JD

*271 Cadman Plaza East  
Brooklyn, New York 11201*

April 30, 2012

By ECF and Facsimile

The Honorable Carol B. Amon  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: United States v. Nicholas Santora  
Criminal Docket No. 12-50 (S-5) (CBA)

Dear Judge Amon:

The government writes to advise the Court of a superseding indictment that was filed in the above-captioned case. The superseding indictment ("S-5") was filed under seal on April 26, 2012 and charges the defendant Nicholas Santora with an additional racketeering act (Racketeering Act One) and two substantive charges (Counts Two and Three), all of which are based on the same conduct. Specifically, defendant Santora is charged with extorting and conspiring to extort two individuals - identified in the superseding indictment as John Doe #1 and John Doe #2 - on or about and between November 1, 2006 and May 27, 2007. The superseding indictment also charges a new defendant, Anthony Romanello, with the same conduct in Counts Two and Three. Defendant Romanello is scheduled to be arraigned on the superseding indictment on April 30, 2012 before the Honorable Ramon E. Reyes.

Respectfully submitted,

LORETTA E. LYNCH  
United States Attorney

By: \_\_\_\_\_  
Amir H. Toossi  
Assistant United States Attorney  
(718) 254-6176

cc: Clerk of the Court (CBA) (by ECF)  
Richard A. Rehbock, Esq. (by ECF)  
Gerald J. McMahon, Esq. (by ECF)